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To: NOP Livestock
Subject: Pasture requirements for Organic

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To: National Organic Program

This is a response to the USDA questions regarding pasture.

Access to Pasture:

* Yes, stress and health levels of organic dairy cows are directly related to the amount of time spent on well managed pasture.

*Yes, the benefits of fresh green forage for any ruminant animal are well documented versus feeding stored forages that have lost a large portion of the beta carotene, vitamins, and minerals available from pasture.

*Yes, baby calves and very young heifers would not be able to consume enough dry matter unless supplemented with dry hay and grain. However pregnant cows can benefit immensely from the exercise and the calving condition available to them on a well managed pasture.

Ruminant Animal nutrition:

*From a nutritional stand point the larger percentage of well managed high energy pasture that makes up a ruminant diet the lower the stress level and the higher the nutrition will be. From an economic stand point for the organic dairy man the more pasture that he or she utilizes the higher the profit margin will

be.

*If 30 percent is used as a yearly figure there may need to be regional adjustments based on length of growing season. But 30% should be achievable any where in the lower 48 states.

In our operation DBA Pride and Joy Organic Dairy located in eastern Washington on irrigated soils with 350 cows we achieve 80% dry matter utilization for 7 months out of the year. Our management intensive grazing (MIG) program is the corner stone for both the health and profits sectors of our dairy operation. Without our pasture program we wouldn't even attempt to be an organic dairy.

*Length of growing season and amount of acres available per cow.

*Yes, definitely the right types of grasses at proper stage of growth definitely need to be utilized to maximize DMI animal health and milk production. Yes of course we don't have control over the weather but plans need to be made for DMI of the organic dairy cow.

* Any organic dairy person who wants to be certified by USA standard and compete in our market place in the US should be held to the same set of standard we adhere to.

* Yes the level of detail adequately ensures the pasture needs of the organic livestock.

Minimum Pasture Requirements:

*NRC nutritional requirements for a dairy cow based on weight and body size need to be used as the base guide line. Her requirements for a 305 day lactation and 60 day dry period need to be computed. the dairyman then needs to offer verification for additional purchased and home grown feed that was supplied to the herd based on cow numbers. The amount of dry matter that was available to the herd from pasture would be calculated from the total supplement feed that was supplied to the herd.

*The health status and replacement rate of dairy cows on a well managed MIG program are considerably lower than involuntary replacement rate for the national average for all dairy cows.

* It is based on quality. Dairy cows with high energy requirements need high quality, highly digestible, densely growing forage available to them to be able to full fill their requirements in a short period of time.

* It would definitely be affected. We have no control over the weather!

* The conscience profit minded organic dairyman needs and will want to work toward maintain the highest quality pasture that he can for his particular operation. There would be no way to effectively monitor pasture quality from a regulation stand point because time of year and weather conditions are hugely variable.

* No! To specific animal unit stocking. Amount of DMI per animal should be the yardstick used for particular operations adherence to the organic pasture guidelines.

*No. Time range would not.

* Yes a livestock feed requirement should specify how much feed comes from pasture.

Measurement Enforcement and Compliance:

*Please refer to the answer for first question under Minimum Pasture requirements.

*Yes, they can verify compliance through the organic system plan.

Market and Other Impacts:

*The economic benefits to an organic dairy from a MIG pasture program are will documented over a period of many years. The more any producer chooses and is able to participate in such a program the higher his profit margins will continue to grow. Any organic dairy that is not able to satisfy the minimum pasture requirements will continue to struggle to maintain profitability.

*Yes of course.

*Any dairy animal regardless of stage of growth or lactation will benefit health and production wise from a well managed MIG program.

*As a practitioner of MIG as a nonorganic dairy for the past 17 years, we have been able to maintain profitability through times of low milk prices and other economic hard ships and as an organic dairy for the past 1 1/2 years.

Respectfully submitted , Allen Voortman DBA: Pride and Joy Organic Dairy